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Subject: Ringwood OU3 Proposed Plan Comment Period Extension Request
Date: Wednesday, June 03, 2020 12:28:37 PM

Mr. Joseph Gowers, Remedial Project Manager
Ms. Pat Seppi, Community Involvement Coordinator
U.S. EPA, Region 2
290 Broadway, 19th Floor
New York, NY 10007-1866

June 3, 2020

Dear Mr. Gowers and Ms. Seppi,

We are writing to demand the EPA to extend the comment period for the Ringwood Proposed Plan by at least 60 days. Since the previous extension, the State of New Jersey continues to have active restrictions on both mobility and access to public buildings as part of the COVID-19 emergency response, and as such, the immediate Ringwood community and other stakeholders have continued to be severely limited in their ability to fully participate in the comment period under its current deadline:

(1) Ringwood reference documents-repositories, such as the Ringwood Public Library, which residents have been directed by EPA to go to access key information on the EPA's activities at the Ringwood Mines/Landfill Superfund Site, have remained (and continue to remain) closed over much of the comment period.

(2) The Ramapough Lenape Nation families and Ringwood community as a whole have experienced serious illness and loss of members of their community because of the COVID-19 crisis, on top of the already decades-long human health concerns from the Site-related contamination.

(3) As you know, the Ringwood Site is unique in that it is the first site to be listed on the National Priorities List (NPL) twice, due to government failures at all levels to address principal threat wastes that continued to pose an unacceptable risk to human health. There are at least twice the amount of official documents in both the Administrative Record and in the over ten years of Community Advisory Group (CAG)-related files, that the community must be afforded an appropriate time to access and review.

Edison Wetlands Association has continued to work during this time to prepare and disseminate information on the Site to Ringwood families, especially those who do not have reliable internet or computer access to review the materials online. Our organization, however, has also been delayed because of COVID-19 in getting the three technical advisors' reviews of EPA and Ford documents uploaded online, which will be crucial for the community to review. The extension must also be granted because we, as does the community, must be able to review the revised Consent Decree and the Proposed Plan in context of the Borough missing its statutory timelines relative to the O'Connor Disposal Area (OCDA). This missed timeline should have automatically triggered the Borough being required to go with the EPA plan outlined in the original ROD.

EPA cannot move forward with ending the comment period on June 3rd in the midst of inherent restrictions on accessing the very public participation resources EPA promotes in its

own Proposed Plan; it is a serious dereliction of EPA's community involvement statutory requirements under CERCLA. The community's participation should be the highest priority, given the significant time adjustments and considerations that were afforded to the responsible parties during every stage of this process; most notably, the derailing of EPA's original remedial plans submitted to the National Remedy Review Board for the site (full cleanup of the OCDA) due to the Borough's last-minute and deceptive recycling center proposal.

EPA must extend the comment period by at least 60 days, then re-evaluate at that time if continued government restrictions and/or force majeure events require any additional time or resources be provided to the community stakeholders. Failing to extend the comment period violates the spirit of the community involvement statute if not the actual regulations within CERCLA. EPA needs to take the community's environmental justice designation into strong consideration during these unprecedented times so that this disenfranchised community and extended stakeholders may have meaningful participation in the decision-making process.

These last several weeks as well as the preceding several months of this year have exposed the inherent racism within our government at all levels, especially our national government. **The issue of systemic environmental racism has been a major factor in the decision-making processes at the Ringwood Site, being recognized by both the U.S. EPA and State of NJ.** Therefore we are asking EPA to also convene a special tribunal within Washington D.C. to review the complete Administrative Records on this Site and bring it back before the NRRB, because the Ramapough Lenape Nation has been subject to racism that has permeated many cities of the United States, and their leadership has expressed on multiple occasions that this has led to the wholesale genocide of their culture.

Please distribute this to all members of the Ringwood Community Advisory Group, within all management of Region 2, as well as the National Remedy Review Board. Please also confirm receipt of this document as well as a response to the requests herein.

Respectfully,

Robert Spiegel
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